

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

INNOCENT OBI,	)	
	)	
	Plaintiff,	
vs.	)	Case No. 1:10-cv-3154
	)	
CHASE HOME FINANCE, LLC., CHASE	)	Judge Suzanne B. Conlon
BANK (JPMC SPECIALTY MORTGAGE	)	
LP), SAFEGUARD PROPERTY, and	)	
CHASE BANK, NA.,	)	
	)	
	Defendants.	

**ANSWER TO AMENDED COMPLAINT**

NOW COMES defendant SAFEGUARD PROPERTY LLC, by its attorneys, and as for its Answer to plaintiff's Amended Complaint (Doc. 55), states as follows:

**COUNT I**  
**Trespass**

47. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

48. This defendant denies the allegations contained in Paragraph 48.

49. This defendant denies the allegations contained in Paragraph 49.

50. This defendant denies the allegations contained in Paragraph 50.

51. This defendant denies the allegations contained in Paragraph 51.

52. This defendant denies the allegations contained in Paragraph 52.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that

judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

**COUNT II**  
**Trespass to Chattels**

53. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

54. This defendant denies the allegations contained in Paragraph 54.

55. This defendant denies the allegations contained in Paragraph 55.

56. This defendant denies the allegations contained in Paragraph 56.

57. This defendant denies the allegations contained in Paragraph 57.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

**COUNT III**  
**Intentional Infliction of Emotional Distress**

58. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

59. This defendant denies the allegations contained in Paragraph 59.

60. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraph 60, and therefore neither admits nor denies the same, but demands strict proof thereof.

61. This defendant denies the allegations contained in Paragraph 61.

62. This defendant denies the allegations contained in Paragraph 62.

63. This defendant denies the allegations contained in Paragraph 63.

64. This defendant denies the allegations contained in Paragraph 64.

65. This defendant denies the allegations contained in Paragraph 65.

66. This defendant denies the allegations contained in Paragraph 66.

67. This defendant denies the allegations contained in Paragraph 67.

68. This defendant denies the allegations contained in Paragraph 68.

69. This defendant denies the allegations contained in Paragraph 69.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

**COUNT IV**  
**Conversion**

70. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

71. This defendant denies the allegations contained in Paragraph 71.

72. Objection, paragraph 72 states a legal conclusion; without waiving said objection, this defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraph 72, and therefore neither admits nor denies the same, but demands strict proof thereof.

73. This defendant denies the allegations contained in Paragraph 73.

74. This defendant denies the allegations contained in Paragraph 74.

75. This defendant denies the allegations contained in Paragraph 75.

76. This defendant denies the allegations contained in Paragraph 76.

77. This defendant denies the allegations contained in Paragraph 77.

78. This defendant denies the allegations contained in Paragraph 78.

79. This defendant denies the allegations contained in Paragraph 79.

80. This defendant denies the allegations contained in Paragraph 80.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

**COUNT V**  
**Punitive Damages**

81. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

82. This defendant denies the allegations contained in Paragraph 82.

83. This defendant denies the allegations contained in Paragraph 83.

84. This defendant denies the allegations contained in Paragraph 84.

85. This defendant denies the allegations contained in Paragraph 85.

86. This defendant denies the allegations contained in Paragraph 86.

87. This defendant denies the allegations contained in Paragraph 87.

88. This defendant denies the allegations contained in Paragraph 88.

89. This defendant denies the allegations contained in Paragraph 89.

90. This defendant denies the allegations contained in Paragraph 90.

91. Objection, paragraph 91 is vague, ambiguous and argumentative; without waiving said objections, this defendant denies the allegations contained in paragraph 91.

92. This defendant denies the allegations contained in Paragraph 92.

93. Objection, paragraph 93 is vague, ambiguous and argumentative; without waiving said objections, this defendant denies the allegations contained in paragraph 93.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

**COUNT IX**  
**Conspiracy**

136. This defendant does not have sufficient knowledge with which to form a belief as to the truth of the allegations contained in paragraphs 1 through 46, and therefore neither admits nor denies the same, but demands strict proof thereof.

137. This defendant denies the allegations contained in Paragraph 137.

138. This defendant denies the allegations contained in Paragraph 138.

139. This defendant denies the allegations contained in Paragraph 139.

140. This defendant denies the allegations contained in Paragraph 140.

141. This defendant denies the allegations contained in Paragraph 141.

142. This defendant denies the allegations contained in Paragraph 142.

143. This defendant denies the allegations contained in Paragraph 143.

WHEREFORE, the defendant, SAFEGUARD PROPERTY LLC, denies that plaintiff, INNOCENT OBI is entitled to judgment in any sum whatsoever and prays that judgment be entered for the defendant and against the plaintiff and that plaintiff's cause of action be dismissed at plaintiff's costs.

Respectfully Submitted,

By: /s/ Peter J. Strauss  
One of the Attorneys for Defendant  
Safeguard Property LLC

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